

OFFICE OF  
GENERAL COUNSEL

2018 MAY 23 AM 11: 54

## Margaret Yonco-Haines

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Garrison, NY 10524

Call Phone: '  
Email: margaret@haines.org

May 22, 2018.

Office of the General Counsel  
Federal Election Commission  
1050 First Street, NE  
Washington, DC 20463

MUR # 7394

Dear Commissioners:

I am writing to request that the Federal Election Commission (FEC) launch an investigation into the campaign of James D. O'Donnell, a candidate for U.S. Congress in New York's Eighteenth District. As set forth below, there is substantial reason to believe that Mr. O'Donnell's campaign has violated the Federal Election Campaign Act on multiple occasions. These violations require prompt investigation to correct the violations and to assure that Mr. O'Donnell's campaign is brought into compliance with the law.

### 1. Failure to Account for In-Kind Contributions

A review of Mr. O'Donnell's most recent filing with the FEC - dated 4/14/2018 - reveals that his campaign has failed to report, as required, in-kind contributions to his committee. Each of these contributions constitute a violation of campaign finance reporting requirements. Given that his most recent filing reports only \$33.90 in operating expenditures (or expenditures of any kind), one can only draw the conclusion that the costs of these campaign events were borne by the corporate or other sponsors of the events. To the extent the costs of the events were paid for by the corporate sponsor, the costs would constitute a prohibited corporate contribution. Any unreimbursed use of corporate facilities or resources is also a violation.

The details of these violations are outlined below.

- a) Campaign Announcement held at Mediacom Communications Corporation in Chester, NY (see Attachment A)<sup>1</sup>
- b) Campaign Fundraiser held at Dana Distributors Inc. in Goshen, NY on 3/8/18

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<sup>1</sup> <http://www.recordonline.com/news/20180131/maloney-challenger-opens-campaign>

The event was advertised on the O'Donnell for Congress Facebook page<sup>2</sup> and was described thusly:

*"Come join James O'Donnell as he kicks off his campaign for Congress.*

*Fundraiser will be held at Dana Distributors, at 52 Hatfield Lane in Goshen. Tickets are \$100, with checks payable to O'Donnell for Congress. Please RSVP so we know you're coming, by emailing us at [contact@voteodonnell.com](mailto:contact@voteodonnell.com).*

*Sponsorships are also available to help us get closer to moving the Hudson Valley in the right direction again:*

*BRONZE: \$250  
SILVER: \$500  
GOLD: \$1000  
PLATINUM: \$2500*

*Looking forward to seeing you there!"*

For Mr. O'Donnell's committee to use the corporate space legally, the committee would need to either rent it or accept a lawful in-kind contribution. However, nowhere in Mr. O'Donnell's most recent filing is such an expenditure or in-kind contribution reported.

With this fact in mind, the only conclusion one can draw is that the corporation or someone else donated the space or the rental fee for the space as an in-kind contribution.

Dana Distributors Inc. is a corporation (see Attachment B). Consequently, it could not have absorbed any of the costs of the event without making an illegal corporate contribution.

c) Campaign Fundraiser held at Dutchess Manor in Beacon, NY on 3/25/18

This event was also advertised on the O'Donnell for Congress Facebook page and is described similarly to the event outlined in (b).

Nowhere in Mr. O'Donnell's filing is an expenditure or in-kind contribution listed for the event. It is inconceivable that an event could be held at this commercial venue without substantial costs.

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<sup>2</sup> <https://www.facebook.com/events/2080972012161378/>

## 2. Receipt of Illegal Corporate Contributions and Failure to Return Said Contributions in a Timely Manner

A review of Mr. O'Donnell's most recent filing with the FEC - dated 4/14/18 - lists two illegal contributions: one from a corporate entity and the other from a limited liability company. The committee noted on its report that these contributions were illegal and needed to be refunded. Nevertheless, the committee does not report the required refunds in its filing.

Under 11 CFR 103.3(b)(1), "if the contribution cannot be determined to be legal, the treasurer shall, within thirty days of the treasurer's receipt of the contribution, refund the contribution to the contributor". Given that the committee acknowledged the contributions below were illegal, the committee's failure to timely refund the contributions is violation of the law. By not returning these contributions within the mandated 30-day window, it appears that Mr. O'Donnell's campaign is in knowing violation of federal law.

The contributions in questions are identified below in chronological order

### a) \$500 contribution from Maxwell Security Group LLC (see Attachment C)

Full Name (Last, First, Middle Initial) Maxwell Security Group LLC, Maxwell Security Gro., CORP.			Date of Receipt 02 21 2018
Mailing Address & Other Useful Ch.			Transaction ID : SA11AJ4372
City Goshen	State NY	Zip Code 10924	Amount of Each Receipt this Period 500.00
FEC ID number of contributing federal political committee. C			Memo Item
Name of Employer Maxwell Security Group LLC		Occupation Maxwell Security Group LLC	
Receipt For: 2018 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Election Cycle-to-Date 500.00	

### b) \$500 contribution from Cameo Hills Ltd. (see Attachment D)

Full Name (Last, First, Middle Initial) Cameo Hills Ltd., Cameo Hills Ltd., . . .			Date of Receipt 02 28 2018
Mailing Address 40 Grove Street			Transaction ID : SA11AJ4362
City Montgomery	State NY	Zip Code 12549	Amount of Each Receipt this Period 500.00
FEC ID number of contributing federal political committee. C			Memo Item
Name of Employer Cameo Hills Ltd.		Occupation Cameo Hills Ltd.	
Receipt For: 2018 <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Election Cycle-to-Date 500.00	

I request that the Commission promptly review this matter, find reason to believe that violations have occurred and resolve this matter.

Sincerely,



Margaret Yonco-Haines

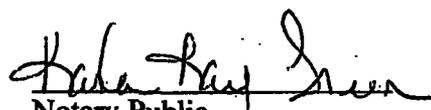
ACKNOWLEDGEMENT

State of New York )

) ss:

County of Putnam )

Subscribed and sworn to before me on this 22<sup>nd</sup> day of May, 2018 by Margaret Yonco-Haines

  
Notary Public

KARLA RAY GREEN  
Notary Public, State of New York  
Qualified in Orange County  
Reg. No. 01GR6082947  
My Commission Expires Nov. 4, 20 18

1800-451-1234

# Attachment A

## Media Company Overview of Mediacom Communications Corporation

May 09, 2018 9:44 AM ET

Snapshot

People

### Company Overview

Mediacom Communications Corporation, a cable television company, provides Internet, phone, and digital cable TV services. The company also offers business Internet, business phone, managed voice solutions, business TV and music, mobile data, and Web hosting for small businesses. It serves customers in government, education, healthcare, finance, and hospitality industries. Mediacom Communications Corporation was founded in 1996 and is based in Mediacom Park, New York. It has locations in West Des Moines, Cedar Rapids, and Des Moines, Iowa; Moline, Illinois; Springfield, Missouri; Waseca, Minnesota; Gulf Breeze, Florida; Menifee, California; Apache Junction, Arizona; Benton, Kentucky; Valdosta...

### Detailed Description

One Mediacom Way  
Chester, NY 10918  
United States

Founded in 1996  
4,410 Employees

Phone: 877-847-8221  
Fax: 845-698-4089  
www.mediacomcable.com

### Key Executives For Mediacom Communications Corporation

Mr. Rocco B. Comisso  
Chairman & CEO  
Age: 67

Mr. Mark E. Stephan  
Executive VP & CFO  
Age: 60

Mr. John G. Pascarella  
Executive Vice President of Operations  
Age: 55

Mr. Joseph E. Young  
Senior VP, General Counsel & Secretary  
Age: 58

Mr. Brian M. Walsh  
Senior VP & Corporate Controller  
Age: 51

Compensation as of Fiscal Year 2017

### Mediacom Communications Corporation Key Developments

#### Mediacom Communications Corporation Announces Unaudited Earnings Results for the Fourth Quarter and Full Year Ended December 31, 2017

Feb 22 18

Mediacom Communications Corporation announced unaudited earnings results for the fourth quarter and full year ended December 31, 2017. For the quarter, the company reported total revenues of \$471,783,000 compared to \$480,460,000 a year ago. OIBDA was \$184,072,000 compared to \$183,182,000 a year ago. Capital expenditures were \$82,716,000 compared to \$89,204,000 a year ago. Free cash flow was \$75,674,000 compared to \$65,392,000 a year ago. Adjusted OIBDA was \$184,072,000 compared to \$183,182,000 a year ago. For the year, the company reported total revenues of \$1,877,551,000 compared to \$1,810,255,000 a year ago. OIBDA was \$711,999,000 compared to \$693,974,000 a year ago. Capital expenditures were \$341,765,000 compared to \$336,173,000 a year ago. Free cash flow was \$264,377,000 compared to \$237,041,000 a year ago. Adjusted OIBDA was \$711,999,000 compared to \$693,974,000 a year ago.

#### Mediacom Communications Corporation Announces Completion of \$1,050 Million of New Senior Secured Term Loans

Nov 2 17

Mediacom Communications Corporation ("MCCC") announced the completion of \$1,050 million of new senior secured term loans, of which \$250 million matures in November 2022 and \$800 million in January 2025, and a \$375 million revolving credit facility expiring in November 2022 (together with the senior secured term loans, the "financing transactions"). Proceeds from the financing transactions were used to repay all outstanding indebtedness under Mediacom Broadband LLC's former bank credit facility, and such transactions were completed pursuant to a new amended and restated bank credit agreement. In conjunction with the financing transactions, Moody's Investors Service raised its corporate family rating on MCCC from Ba3 to Ba2 with a positive outlook. Standard & Poor's Rating Services affirmed MCCC's BB corporate family rating and stable outlook.

#### Mediacom Communications Corporation Announces Unaudited Earnings Results for the Third Quarter Ended September 30, 2017

Nov 1 17

Mediacom Communications Corporation announced unaudited earnings results for the third quarter ended September 30, 2017. For the quarter, the company reported total revenues of \$471,555,000 against \$454,187,000 a year ago. OIBDA was \$173,039,000 against \$159,084,000 a year ago. Capital expenditures



## Mediacom Communications Corporation



(Mediacom)

### Contact Information

**Mediacom Communications Corporation**  
 1 Mediacom Way  
 Chester, NY 10918

**Contact:** Rocco B Commisso  
**Title:** Chief Executive Officer  
**Phone:** (877) 847-6221  
**Website:**

There are 8 Companies located at 1 Mediacom Way, Chester, NY 10918

### Business Description

Mediacom Communications Corporation, which also operates under the name Mediacom, is located in Chester, New York. This organization primarily operates in the Cable and other Pay Television Services business / industry within the Communications sector. This organization has been operating for approximately 19 years. Mediacom Communications Corporation is estimated to generate \$2.6 billion in annual revenues, and employs approximately 32 people at this headquarters location and 4,520 total employees across all locations.

### Map

[About Us](#)

[Partnerships](#)

[Terms of Use](#)

[Contact Us](#)

**Sector:** Communications

**Category:** Cable and other Pay Television Services

**Industry:** Cable and other Pay Television Services

**Other:** Internet Connectivity Services

**SIC Code:** 4841, 4813

[Privacy Policy](#)

[Remove Company](#)

# A Hachmann + B

## Dana Distributors



OUR HISTORY

[/about/company-history](#)

Since 1970 Dana Distributors, Inc. has been serving Orange County the freshest beer in the industry. We extended our service to Rockland County in 2000 and Sullivan County in 2001.

We will continue to attain a measure of performance that assures that our customers recognize us as the finest distributor of quality beverages and service in the industry.

"Making Friends is Our Business"

### Orange County Sales

[Click here to see sales contact information. \(/sales\)](#)

### Rockland County Sales

[Click here to see sales contact information. \(/sales\)](#)

### Sullivan County Sales

[Click here to see sales contact information. \(/sales\)](#)

## PRODUCTS

### Imported Beer

<http://www.journalshira.com/porta-extensions.html>

### Craft Beer

[/craft-beer-dana](#)

### Non-Alcoholic Beverages

<http://www.journalshira.com/food-beverage.html>

## SALES INFORMATION

### Sales Team Information

[/sales-usa](#)

## CONTACT INFO

Dana Distributors, Inc. is located in Goshen, New York and our office hours are Monday through Friday 9:00am - 5:00pm EST.

- Phone: (845) 294-4100
- Fax: (845) 294-4111
- Email: [info@danadistributors.com](mailto:info@danadistributors.com) ([marketing@danadistributors.com](mailto:marketing@danadistributors.com))
- Address: 82 Hatfield Lane - Goshen, NY 10924

Copyright © 2018 Dana Distributors, Inc. All rights reserved.  
82 Hatfield Lane - Goshen, NY 10924 / (845) 294-4100

Website developed & hosted by **DAVID'S WEB DESIGN** of New York (<http://www.2david.com>)



O'Donnell for Congress shared an event.

March 7 · 🌐

...

THURSDAY AT 6PM! Come to Dana Distributors at 52 Hatfield Lane in Goshen to meet candidate James O'Donnell and celebrate the end of the snowstorm! Click for admission and RSVP info. See you Thursday!

*James D.* ★  
**O'DONNELL**  
FOR CONGRESS

THU, MAR 8

**Come and Meet James O'Donnell, Candidate  
for Congress**

★ Interested





O'Donnell for Congress shared an event.

March 24 at 9:34am · ↪

THIS WEEKEND! Join us Sunday 3/25 at for an afternoon with Jimmy! We'll be at Dutchess Manor (23 NY-9D in Beacon) starting at 1:30. Pay at the door, or get your tickets online at [bit.ly/teamodonnell](http://bit.ly/teamodonnell) via secure transaction; click below on the event link for ticket info. RSVP at [contact@voteodonnell.com](mailto:contact@voteodonnell.com). See you there!

*Fundraiser*

*James D.* ★  
**O'DONNELL**  
FOR CONGRESS

SUN, MAR 25

**Sunday Afternoon Get-Together**

Dutchess Manor · Beacon, NY

★ Interested

👤 Causes



O'Donnell for Congress added an event.

March 14 · 🌐

Come spend a pleasant spring Sunday afternoon with us in Dutchess!

Join us 1:30 pm March 25 at Dutchess Manor, at 263 NY-9D in Beacon, for an afternoon with Jimmy and our friends. Our last event was a rousing success, even despite the weather; let's make this one even better and give the Lower Hudson Valley a fighting chance in Congress!

PLEASE RSVP by emailing us at [contact@voteodonnell.com](mailto:contact@voteodonnell.com); we will be happy to answer any questions.... See More

*Fundraiser*

*James D.* ★  
**O'DONNELL**

F O R C O N G R E S S

SUN, MAR 25

**Sunday Afternoon Get-Together**

Dutchess Manor · Beacon, NY

★ Interested

🌐 Causes

# Attachment C

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## Company-detail.com

[Home](#) [Terms](#)

### MAXWELL SECURITY GROUP, LLC

MAXWELL SECURITY GROUP, LLC is an entity registered at ORANGE county with company number 4516128. THE LIMITED LIABILITY COMPANY located at the address 2 Shea Knolls Ct. Campbell Hall, New York, 10916. Company is incorporated on January 9, 2014. Current status of the company is active.

#### Rating

+ 0 -

Company name: MAXWELL SECURITY GROUP, LLC  
DOS ID #: 4516128  
Initial DOS Filing Date: January 9, 2014



County: ORANGE  
Jurisdiction: NEW YORK  
Company Type: DOMESTIC LIMITED LIABILITY COMPANY  
Current Company Status: ACTIVE

#### Company Address Information

DOS Process: THE LIMITED LIABILITY COMPANY  
2 SHEA KNOLLS CT.  
CAMPBELL HALL, NEW YORK, 10916

#### Name History

Filing Date	Name Type	Company Name
January 28, 2014	Actual	MAXWELL SECURITY GROUP, LLC
January 21, 2014	Actual	MAXWELL DILIGENCE & VIGILANCE, LLC

All data are drawn from publicly available sources. This data is provided for informational purposes only.

#### News

Square Feet: Philadelphia's First Platform of Innovation  
17:19, February 20, 2018 > J HURDLE

S&P, Dow Falter After Six Days of Walmart Weighs  
16:15, February 20, 2018 > R

Economic Scene: Come the Recession Don't Count on That Safety Net  
16:02, February 20, 2018 > E PORTER

# Attachment D

HOME COMPANY LIST REGISTER A NEW YORK BUSINESS CONTACT US

## CAMEO HILLS, LTD.

(DOS ID # 1220093)

CAMEO HILLS, LTD. was registered on Nov 20 1987 as a domestic business corporation type registered at & CATANIA, PC, S. TARSHI 1 CORWIN COURT B-1479 NEWBURGH, The country for this new york company is ORANGE, and the current entity status is Active. Cameo Hills, Ltd. has been running for 30 years 5 months, and 19 days since it registered.



Entity Name:  
CAMEO HILLS, LTD.

Entity Type:  
DOMESTIC BUSINESS CORPORATION

Initial DOS Filing Date:  
1987-11-20

Status:  
Active

Website:  
Website

County:  
ORANGE

Jurisdiction:  
NEW YORK

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)  
C/O DRAKE SOMMERS LOEB TARSHIS  
& CATANIA, PC, S. TARSHI 1 CORWIN COURT B-1479  
NEWBURGH, NEW YORK 12550

### Companies of the same DOS process name - C/O DRAKE SOMMERS LOEB TARSHIS.

Company Name	Date of Incorporation	Status
MONTGOMERY COMMERCIAL PARK, INC.	1987-04-21	Active

This office does not record information regarding the names and addresses of officers, shareholders or directors of nonprofessional corporations except the chief executive officer, if provided, which would be listed above. Professional corporations must include the name(s) and address(es) of the initial officers, directors, and shareholders in the initial certificate of incorporation, however this information is not recorded and only available by viewing the certificate.

Company Name Search

Search



### Recent registered company

MUDFLAP PRODUCTIONS INC  
OLD FARM FOODS, LLC  
HZ FASHION INC  
MASTERPIECE GLOBAL INC  
THE FUTURE TREND INC  
TAXDALE INC  
DOG HOUSE CLUB INC  
BOO GROUP LLC  
HELEN CT, LLC  
NEXT12 REALTY LLC